

**MEMO ENDORSED**USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 05/19/2022**LAW OFFICES OF JILL R. SHELL**

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May 18, 2022

**BY ECF AND EMAIL**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007  
[CaproniNYSDChambers@nysd.uscourts.gov](mailto:CaproniNYSDChambers@nysd.uscourts.gov)

**RE: *United States v. Ronald Glen Davis*, 21-cr-603 (VEC)**


Dear Judge Caproni:

I represent Glen Davis, and I am writing to request a temporary modification of Mr. Davis' bail conditions so that he can perform this weekend at two comedy shows in Massachusetts and New Hampshire. A copy of the contract is attached. Mr. Davis' travel is restricted to the Southern District of New York, the Central District of California and points in between as necessary for travel. We respectfully request a temporary modification to permit Mr. Davis to travel to the Districts of Massachusetts and New Hampshire starting tomorrow, May 19 through May 22, 2022. Mr. Davis is trying to launch a new career, and he will have a difficult time securing future bookings if he defaults on this contract.

I recognize that this request is last minute. As Your Honor knows, Pretrial Services submitted a memorandum this afternoon to Your Honor. PTS does not consent to this request pending Your Honor's response to the memorandum. I held off writing to Your Honor hoping that we might obtain PTS' consent. Last night and this evening I asked the prosecutors for their position on this request, and as of this writing I have not received a response.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shell

Copies by Email to:

AUSA Ryan Finkel  
AUSA Kristy Greenberg  
Dennis Khilkevich, SDNY Pretrial Services

## EVENT AGREEMENT

This agreement (the "Agreement") is made as of April 13th 2022 (the "Effective Date") by and between iconix Productions and Glen Davis ("Client"),

THE EVENT: Client hereby engages iconix Productions to organize events which are described below:

iconix Productions' RESPONSIBILITIES: iconix Productions agrees to book performers for the Event, provide a PA system to be used during the event, arrive at the Venue one hour prior to the Event in order to organize the performance space, and promote the Event.

Client's RESPONSIBILITIES: Client agrees to do the following: Show up to the performance space at 7:00 PM on following dates and locations.

May 20 Salut! Wine Bar 1204 Constitution Ave, Littleton, MA 01460

May 21 Copper Kettle To Go 39 Main St, Wilton, NH 03086

June 11 Bright Ideas Brewing 111 Mass MoCA Way, North Adams, MA 01247

Promote the show together with iconix Productions and Mike Fahey.

COMPENSATION: iconix Productions will keep 50% of the general admission fees and the Client will keep 50% of the general admission fees and 100% of the meet and greet fee. All refund fees for General Admission will be split by both parties in the event of cancellation. Meet and greet fee will be paid for by the client in event of cancellation.

### Pricing for Tickets

\$25 for 1 General Admission

\$40 for 2 General Admission

\$35 for 1 GA/Meet and Greet

Meet and Greet \$10

CANCELLATION: The Event and this Agreement can be cancelled by either Party no less than 7 (seven) days prior to the Event

Mike Fahey iconix Productions



Client



Although the Court frowns upon the last minute nature of the request and what appears to be frequent violations of the conditions of Mr. Davis' bail, Mr. Davis' request to modify the conditions of his bail is GRANTED. Mr. Davis may travel to the Districts of Massachusetts and New Hampshire from May 19, 2022 to May 22, 2022. Mr. Davis must provide Pre-trial Services with the locations and contact information for each place he is staying by 5:00 P.M. on May 19, 2022.

The Court will not approve any additional modifications to Mr. Davis' bail, pending the bail review hearing scheduled for Wednesday, May 25, 2022 at 2:00 P.M.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

Date: May 19, 2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE